

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DR. SHIVA AYYADURAI,

Plaintiff,

v.

WILLIAM FRANCIS GALVIN,
MICHELLE K. TASSINARI,
DEBRA O'MALLEY,
AMY COHEN,
NATIONAL ASSOCIATION OF
STATE ELECTION DIRECTORS,
all in their individual capacities, and
WILLIAM FRANCIS GALVIN,
in his official capacity as the Secretary
of the Commonwealth of Massachusetts,

Case No.: 1:20-cv-11889-MLW

Defendants.

AFFIDAVIT OF DR. SHIVA AYYADURAI

I, Dr. Shiva Ayyadurai, do hereby depose and state as follows:

1. I am over 18 years of age and I am competent to state, and have personal knowledge of the matters set forth herein.
2. In addition to the sealed affidavit I have filed, the Court's Order of July 16, 2021, Dkt. 160, requires me to file a public affidavit to accompany a memorandum to show cause for why I should not be sanctioned or face civil or criminal contempt proceedings for causing my counsel, Todd & Weld, to miss the July 16, 2021 deadline to file certain documents.
3. As stated in the Memorandum, I attempted to work closely with the Todd & Weld lawyers, and all of us acted in good faith.

4. It was only in the final week before the July 16 deadline that I learned of the extent of my substantive dispute with my counsel and was able to review a rough draft of the memorandum the firm had prepared, work I felt fell short of the Court's expectations.

5. Because the firm left me the only alternative of accepting its work or seeking new counsel, I believed new counsel would better serve the best interests of the case.

6. I believed that new counsel would be able to obtain an extension that would allow time to prepare the documents that would meet the Court's expectations and serve the case's best interests.

7. I have never been accused of misconduct in any proceeding I have been involved in.

Signed under the penalties of perjury this 22nd day of July, 2021.

Yours respectfully,

July 22, 2021

/s/ Dr. Shiva Ayyadurai
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